

raiser&kenniff
ATTORNEYS AT LAW

Steven M. Raiser, Esq.
Thomas A. Kenniff, Esq.
Anthony J. Colleluori, Esq.
James M. Ingoglia, Esq.
E. Gordon Haesloop, Esq.
Bruce R. Connolly, Esq.
John F. Campbell, III, Esq.
Ethan D. Irwin, Esq.
Valerie K. Mitchell, Esq.

87 Walker Street
New York, New York 10013
Tel. 212-274-0090 • Fax 888-688-1765

Of Counsel
Emily Shaw Record, Esq.
Laura A. Mintz, Esq.
Khadija A. Misuraca, Esq.

July 30, 2019

Via ECF

The Honorable Carol Bagley Amon
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: USA v. John Scarpa, Jr.
Criminal Docket No. 18-123(S-1)(CBA)

Dear Judges Amon:

This office represents John Scarpa in the above-referenced matter. The defense respectfully requests a thirty (30) day extension to submit its Sentencing Memorandum, which is currently due on August 8, 2019. The reason for this request is that the pre-sentence report (PSR) has not yet been completed and submitted. We have spoken to the Government, who has no objection to this application. We further propose, at the request of the Government, that its response be due two weeks after the Defense's submission, which is in alignment with the current schedule. Therefore, the new proposed schedule, if acceptable to the Court, would be: Defense's submission due August 30, 2019 and the Government's response due September 13, 2019.

Thank you for your consideration of this matter.

Respectfully submitted,



Bruce R. Connolly

Cc: AUSA Andrey Spektor
AUSA Keith Edelman
VIA ECF